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Attorneys for Defendants

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

ALEX VILLANUEVA,

Plaintiff,

v.

COUNTY OF LOS ANGELES,  
COUNTY OF LOS ANGELES  
SHERIFF'S DEPARTMENT, LOS  
ANGELES COUNTY BOARD OF  
SUPERVISORS, COUNTY EQUITY  
OVERSIGHT PANEL, LOS  
ANGELES COUNTY OFFICE OF  
INSPECTOR GENERAL,  
CONSTANCE KOMOROSKI,  
MERCEDES CRUZ, ROBERTA  
YANG, LAURA LECRIVAIN,  
SERGIO V. ESCOBEDO, RON  
KOPPERUD, ROBERT G. LUNA,  
MAX-GUSTAF HUNTSMAN,  
ESTHER LIM, and DOES 1 to 100,  
inclusive,

Defendants.

**CASE NO. 2:24-cv-04979 SVW (JCx)**

**DEFENDANTS' NOTICE OF  
MOTION TO QUASH  
PLAINTIFF'S TRIAL SUBPOENAS  
OR, IN THE ALTERNATIVE,  
MOTION *IN LIMINE***

*[Filed Concurrently with Notice of  
Motion; Memorandum of Points and  
Authorities; Declaration of Jason H.  
Tokoro; and [Proposed] Order]*

Date: June 2, 2025

Time: 1:30 p.m.

Crtrm.: 10A - First Street Courthouse

Assigned to the Hon. Stephen V.  
Wilson, Crtrm. 10A and Magistrate  
Judge Jacqueline Chooljian, Crtrm. 750

Trial Date: June 3, 2025

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that on June 2, 2025 at 1:30 p.m., or as soon  
3 thereafter as this matter may be heard in Courtroom 10-A of the above-captioned  
4 Court, located at 350 W 1st St, Los Angeles, CA 90012. Defendants will and  
5 hereby do move for an order excluding as witnesses at trial Los Angeles County  
6 Board Supervisors Kathryn Barger, Hilda Solis, Janice Hahn, Lindsey Horvath, and  
7 Holly Mitchell, and Los Angeles County Sheriff Robert Luna (the “Apex  
8 Witnesses”).

9 This Motion is brought on the grounds that the Apex Witnesses are high-  
10 ranking officials and Plaintiff has not shown good cause or compelling reasons to  
11 require them to testify at trial. None of the Apex Witnesses has unique or superior  
12 personal knowledge of relevant facts. None of them were involved in the decision  
13 to place a “Do Not Rehire” notation on Plaintiff’s County personnel file.

14 Plaintiff has also not exhausted less burdensome alternatives to calling the  
15 Apex Witnesses. Numerous sworn statements—discovery responses, declarations,  
16 and depositions—have made clear that the information sought by Plaintiff is  
17 available from other sources. Moreover, Plaintiff did not even attempt to depose  
18 three of the six witnesses he now seeks to call at trial, further undercutting any  
19 argument that these witnesses are essential to his case. Plaintiff’s baseless  
20 insistence on subpoenaing these witnesses for trial is intended to do nothing more  
21 than harass them.

22 Accordingly, Plaintiff should be barred from calling the Apex Witnesses to  
23 testify at trial.

24 In accordance with the Local Rules, Defendants met and conferred with  
25 Plaintiff in good faith before filing this Motion. The parties were unable to reach a  
26 resolution of their disputes. (*See* Declaration of Jason H. Tokoro ¶ 11.)

27 This Motion is based upon this Notice of Motion, the Motion, the Declaration  
28 of Jason H. Tokoro, the pleadings and briefing on file with the Court, and any other

1 papers or argument of counsel that may be filed or submitted in connection with this  
2 Motion.

3  
4 DATED: May 14, 2025

Respectfully Submitted,

5 MILLER BARONDESS, LLP  
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8 By: /s/ Jason H. Tokoro

9 JASON H. TOKORO

10 Attorneys for Defendants  
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